

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

United States of America,

Plaintiff,

vs.

Case No. 18-CR-3665-JB

Rigoberto Trejo,

Defendant.

MOTION TO WITHDRAWAL AS COUNSEL

Undersigned counsel hereby move to withdraw their appearances in this matter, and as grounds state:

1. The Court has discretion to grant or deny a motion for withdrawal of counsel when there is “good cause, such as a conflict of interest, a complete breakdown of communication or an irreconcilable conflict.” *United States v. Porter*, 405 F.3d 1136, 1140 (10th Cir. 2005).

2. It is undersigned counsel’s understanding that Mr. Trejo intends to hire another attorney. Nonetheless, even if Mr. Trejo has not hired counsel, irreconcilable differences have arisen in the course of this representation. If the Court requires an explanation, the undersigned respectfully requests an opportunity to do so *ex parte*.

3. Due to the nature of this motion, Defendant has not requested other parties’ position on the motion.

Respectfully submitted,

FREEDMAN BOYD HOLLANDER GOLDBERG
URIAS & WARD, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document electronically through the CM/ECF system. Pursuant to the CM/ECF Administrative Procedures Manual, §§1(a), 7(b)(2), such filing is the equivalent of service on parties of record.

/s/ Molly Schmidt-Nowara_____

Molly Schmidt-Nowara